



VIA ELECTRONIC SUBMISSION

May 20, 2015

Mr. Thomas E. Perez, Secretary
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Regulation Identifier Number: RIN 1210-AB32 (Fiduciary Rule)

Dear Secretary Perez:

I am contacting you on behalf of CUSO Financial Services, LP (“CFS”). CFS is a securities broker/dealer that is registered with the United States Securities and Exchange Commission (the “SEC”), the Financial Industry Regulatory Authority (“FINRA”), the Municipal Securities Rulemaking Board, all fifty (50) states, the District of Columbia, and Puerto Rico. CFS is also a Registered Investment Adviser with the SEC.

I am respectfully requesting that that the comment period regarding the above referenced proposal be extended to 120 days.

CFS would like sufficient time to analyze how the rule will impact our clients, our advisors, and our business practices, especially within the IRA sphere. Additionally, we want to ensure that CFS is able to provide the DOL with thoughtful, constructive commentary that will be helpful in your review of the proposal. Due to the length and complexity of the proposal, we believe that neither of the above objectives can be adequately accomplished within the 75-day comment period that DOL has attached to the proposal.

Thank you for your consideration.

Sincerely,

/s/

Maria J. Seedner
Corporate Counsel